

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

MDL No. 2804

*This document relates to:*

Case No. 1:17-md-2804

*All Cases Noted on Attached Appendix*

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND [PROPOSED] ORDER  
DISMISSING WITH PREJUDICE CLAIMS  
PURSUANT TO WALGREEN NATIONAL SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, the “Dismissing Plaintiffs”) and Defendants Walgreen Co., Walgreen Eastern Co., Inc., and Walgreens Boots Alliance, Inc. (together, “Walgreen”<sup>1</sup>) that, pursuant to the election of each Dismissing Plaintiff to participate in the Walgreen Settlement Agreement, which is dated December 9, 2022, and is binding on the Dismissing Plaintiffs and the Walgreen Defendants, and which has an Effective Date of August 7, 2023, (a copy of which is attached as Appendix B), all claims of each Dismissing Plaintiff against any Walgreen Defendant, including any entity identified on the attached Appendix C, are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own

---

<sup>1</sup> The Released Entities are each and every entity of any of the Walgreen Defendants that is a “Released Entity” as set forth in Section LMMM and Exhibit J of the Walgreen Settlement Agreement, dated as of December 9, 2022, a copy of which is attached as Appendix B. Appendix C, also attached hereto, represents a good faith effort by the Walgreen Defendants to list all Released Entities that may be individually named in any of the Dismissing Plaintiffs’ complaints. Appendix C is not intended to limit the scope of Released Entities, and to the extent that Dismissing Plaintiffs or Walgreen Defendants subsequently identify any Released Entity that should have been included on Appendix C, they will inform the Clerk of the Court.

costs. The Court shall retain jurisdiction with respect to the Walgreen Settlement Agreement to the extent provided under that Agreement.<sup>2</sup>

Dated: July 27, 2023

Respectfully submitted,

Agreed as to form and substance:

/s/Jayne Conroy

Jayne Conroy  
SIMMONS HANLY CONROY  
112 Madison Avenue, 7th Floor  
New York, NY 10016  
(212) 784-6400  
(212) 213-5949 (fax)  
jconroy@simmonsfirm.com

/s/Joseph F. Rice

Joseph F. Rice  
MOTLEY RICE LLC  
28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464  
(843) 216-9000  
(843) 216-9290 (Fax)  
jrice@motleyrice.com

/s/Paul T. Farrell, Jr.

Paul T. Farrell, Jr., Esq.  
FARRELL & FULLER LLC  
1311 Ponce de Leone Ave., Suite 202  
San Juan, PR 00907  
(304)654-8281  
paul@farrellfuller.com

*Plaintiffs' Co-Lead Counsel*

/s/Peter H. Weinberger

Peter H. Weinberger (0022076)  
SPANGENBERG SHIBLEY & LIBER  
1001 Lakeside Avenue East, Suite 1700  
Cleveland, OH 44114  
(216) 696-3232  
(216) 696-3924 (Fax)  
pweinberger@spanglaw.com

*Plaintiffs' Liaison Counsel*

---

<sup>2</sup> To the extent any Plaintiff Subdivision is inadvertently included on Appendix A, the Court retains jurisdiction to hear those disputes. In advance of raising any such issue with the Court, the Plaintiff Subdivision must meet and confer with defense counsel and Plaintiffs' Liaison Counsel.

**Walgreen**

/s/ Kaspar J. Stoffelmayr

Kaspar J. Stoffelmayr  
Katherine M. Swift  
BARTLIT BECK LLP  
54 West Hubbard Street  
Chicago, IL 60654 (312) 494-4400  
kaspar.stoffelmayr@bartlitbeck.com  
kate.swift@bartlitbeck.com

*Attorneys for Defendants Walgreen  
Co., Walgreen Eastern Co., Inc., and  
Walgreens Boots Alliance, Inc.*

SO ORDERED this \_\_\_\_ day of \_\_\_\_, 2023.

---

Hon. Dan Aaron Polster  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on July 27, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

*/s/Peter H. Weinberger*

Peter H. Weinberger